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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Bern, 18–22 March 2013

Item 2 of the provisional agenda

**Tanks****Marking of test date****Transmitted by the Government of Sweden<sup>1, 2</sup>***Summary*

<b>Executive summary:</b>	The proposal will make it easier for the carrier and other participants to fulfil required obligations.
<b>Action to be taken:</b>	Amend 6.8.2.5.2 and 6.8.3.5.11 and /or 1.4.2.2.2.
<b>Related documents:</b>	Document OTIF/RID/CE/GTP/2012/5 to the 1 <sup>st</sup> session of the RID Committee of Experts standing working group.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para. 106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2013/23.

## Introduction

1. At the last session of the RID Committee of Experts Standing Working Group in Riga, Sweden transmitted document OTIF/RID/CE/GTP/2012/5. The document described the problem that arises when the carrier of tank-containers and MEGCs has to ascertain that the deadline for the next test has not expired. The RID-meeting recommended Sweden to transmit a similar document to the Joint-meeting.
2. According to sub-section 1.4.2.2.1 (d) a carrier has the obligation to ascertain that the deadline for the next test of tank-vehicles, tank-wagons, battery-vehicles, battery-wagons, demountable tanks, portable tanks, tank-containers and MEGCs has not expired. For carriage by road this shall be done “where appropriate” but for carriage by rail, it shall be done “for each wagon at the point of departure”. This seems to be two different safety approaches.
3. The information about test date is to be found on a corrosion-resistant metal plate permanently attached to the tank in a place readily accessible for inspection. The date of the most recent test (i.e. not the deadline for the next test) shall be marked on the plate by stamping or by any other similar method. This particular may also be engraved directly on the shell itself.

## Problem

4. Anyone who tries to read the information on these metal plates immediately discovers the problem the carriers will face. The wording “*in a place readily accessible for inspection*” can mean different things. The plate is perhaps in a place readily accessible for inspection when a tank-container or a MEGC is on the ground. However, when it is loaded on a rail-wagon the access to the plate will probably be limited.
5. For tank-wagons and battery-wagons the date of the next inspection shall be inscribed on both sides of the wagon. (See sub-sections 6.8.2.5.2 and 6.8.3.5.11 in RID), but for tank-containers and MEGCs only the date and type of the most recent test shall be marked on the plate. This means that the carrier have to calculate whether the date has expired or not.
6. The rail network is often electrified and carrier personnel cannot easily enter wagons and inspect the next date of inspection. More than one tank-container can also be loaded on a wagon and if the next inspection date is located on the short end of the tank, it can be very difficult for the carrier to ascertain that the date of the next test has not expired. Some examples are shown in pictures below.



7. On this tank-container the metal plate is located in the red circle.
8. Entering a rail wagon, standing on the frame without a gateway can be dangerous when checking the next test date. Therefore, this is also a safety issue for the carrier personnel.



9. With reference to the description of the problem above, Sweden proposes that tank containers and MEGCs intended for transport of dangerous goods on road and rail shall be inscribed with the date of the next inspection on plates on both sides of the containers. Then inspections can be performed more easily and more safely by the carrier.

## Proposal 1

Sweden is aware of the fact that it is up to the UN Sub-Committee to regulate UN-tanks and UN-MEGCs. This proposal is only related to non-UN tank-containers and non-UN MEGCs.

Amend 6.8.2.5.2 right column (new text underlined):

“The following particulars shall be inscribed on both sides of the tank-container (on the tank itself or on plates.)

– date (month, year) of the next inspection in accordance with 6.8.2.4.2 and 6.8.2.4.3 or with the TT special provisions of 6.8.4 for the substance(s) accepted for carriage. If the next inspection is an inspection in accordance with 6.8.2.4.3, the date shall be followed by the letter L.”

Amend 6.8.3.5.11 right column (new text underlined):

“The following particulars shall be inscribed ~~either~~ on both sides of the MEGC itself or on ~~a~~ plates.

– date (month, year) of the next inspection in accordance with 6.8.2.4.3 and 6.8.3.4.13”.

## Alternative solution

In some duties the carrier can rely on information and data provided by other participants. That is not the case concerning paragraph (d) in 1.4.2.2.1 and the date of next test according to 1.4.2.2.2.

An alternative solution of the problem described in this document, could be to have the possibility as a carrier to rely on information provided by other participants, also concerning the date of next test.

## Proposal 2

Amend 1.4.2.2.2 (new text underlined):

“The carrier may, however, in the case of 1.4.2.2.1 (a), (b), (d), (e) and (f), rely on information and data made available to him by other participants.”

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